UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

IN RE: MILDRED C. HAILEY)			
APARTMENTS DRUG AND GUN) VAI	RIOUS	CRIMINAL	NOS.
TRAFFICKING INVESTIGATION)			

AFFIDAVIT OF SPECIAL AGENT KELTAR MUI

I, Keltar Mui, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I am a Special Agent of the Bureau of Alcohol,

Tobacco, Firearms & Explosives ("ATF"). I am submitting this

affidavit in support of the government's motion that the

following individuals be detained pending trial: CERONE DAVIS,

A/K/A "JP"; DOMINIQUE FINCH, A/K/A "HEFF"; JAMES FINCH; JAVONTE

ROBINSON, A/K/A "BIGGIE", A/K/A "BIG DOG"; FRANKLIN SAFO-AGYARE,

A/K/A "FRANKIE SO SMOOTH"; JARROD SIMMONS, A/K/A "RIZZ"; JOE

This affidavit is being filed in the following 7 cases:

(i) United States v. Cerone Davis, A/K/A "JP", Criminal No. 18-; (ii) United States v. Dominique Finch, A/K/A "Heff" and James Finch, Criminal No. 18-; (iii) United States v. Javonte Robinson, A/K/A "Biggie", A/K/A "Big Dog" and Kevin Smith, A/K/A "Works", Criminal No. 18-; (iv) United States v. Franklin Safo-Agyare, A/K/A "Frankie So Smooth", Criminal No. 18-; (v) United States v. Jarrod Simmons, A/K/A "Rizz", Criminal No. 18-; (vi) United States v. Joe Simmons, A/K/A "Profit", Criminal No. 18-; and.,
(vii) United States v. Kendrick Tate, A/K/A "K-Roc", Criminal No. 18-

SIMMONS, A/K/A "PROFIT"; KEVIN SMITH, A/K/A "WORKS"; and

KENDRICK TATE, A/K/A "K-ROC" (hereinafter collectively referred

to as "the Targets"). All of the Targets have been charged with

various drug and/or gun offenses in indictments returned on

January 3, 2018. All but two of these individuals are also

alleged to have been selling cocaine base, a/k/a "crack cocaine,"

in and around the Mildred C. Haley Apartments located in Jamaica

Plain, Massachusetts. These apartments were formerly known as

the Bromley-Heath Housing Development and will hereinafter

referred to as "the Development" or "Bromley-Heath."

- 2. I have been employed by ATF since September 2005. I am responsible for the investigation of violations and enforcement of the federal firearms laws. I am currently assigned to Boston II Field Office, a group of Special Agents who regularly work with state and local detectives in order to uncover violations of laws specifically related to firearms trafficking, firearms possession by prohibited persons, violent crimes committed with firearms and the use of firearms in furtherance of drug trafficking crimes, in and around the City of Boston, Massachusetts.
- 3. I have received training in the field of narcotics enforcement and investigation. I have also received training in

the investigation of organized street gangs involved in narcotics distribution. I have conducted and participated in investigations involving the violation of the federal drug laws, including 21 U.S.C. §§841 and 846 -- illegal distribution of narcotics and conspiracy to distribute narcotics.

4. I have participated in the investigations described in detail below. During my work on these investigations, I have interviewed witnesses about their knowledge of the matters described below and reviewed consensual recordings made in the course of controlled buys of firearms and cocaine base, a/k/a "crack cocaine." I have also reviewed reports prepared by agents regarding other witness interviews, and discussed this case with other law enforcement officers who have assisted in this investigation. Because of my personal participation in this investigation, my conversations with other law enforcement officers and my analysis of reports prepared by other officers, I am familiar with this investigation.

- 5. This affidavit supports the government's request that the Targets be detained pending trial. It is provided for the limited purpose of familiarizing the court with the Development and the persistent problems of drug trafficking and gang-related violence that plague the Development and its residents. It also generally describes the ongoing investigation at Bromley-Heath that began in 2016, and provides some background information regarding the nine individuals that have to date been charged with federal firearm and/or drug trafficking crimes.
- 6. The government is seeking detention in these cases even though some of the younger Targets do not have lengthy adult criminal histories. It does so because the activities described herein are adversely affecting the quality of life for hundreds of people who live in and around the Development and the Targets simply will not conform their conduct to the requirements of the law.

II. THE MILDRED C. HAILEY APARTMENTS, FORMERLY KNOWN AS "BROMLEY HEATH"

7. The Mildred C. Hailey Apartment Complex is located in Jamaica Plain, Massachusetts. It is one of many housing developments owned and/or operated by the Boston Housing Authority ("the BHA") to provide housing for low and moderate-income residents. Notwithstanding the incidence of drug

offenses and violent crime that occur at Bromley-Heath, I understand that there have been and continues to be waiting lists of individuals who seek to live in Bromley-Heath because of the other opportunities and amenities it offers for them and their families.²

8. One of the things that this investigation demonstrated is the impact that drug trafficking and related crime and gangactivity and violence has on the residents of Bromley-Heath, the vast majority of whom have nothing to do with (and are in fact victimized by) the criminal activities described below. During controlled purchases of narcotics made during the course of the underlying investigation, consensual recordings and surveillance made it clear that innocent residents of the development are frequently confronted with drug dealing (often being conducted by individuals who had been ordered out of Bromley-Heath by the BHA and the BHA Police Department) in the hallways or the immediate environs of the apartment buildings where they and their children live. Hence, like all of the ongoing efforts to

² According to information provided to the U.S. Attorney's Office by the Legal Department of the Boston Housing Authority, waiting lists for one and two bedroom apartments at the Development range between 4,600 and 7,249 depending on the size and the location of the apartment sought.

³ Attached to this affidavit as Exhibit 1 is a photograph taken from the buy video made during the sale of crack cocaine made on

curtail drug trafficking and the violence it helps to breed in this area, a principal purpose of both the underlying investigation and the government's request that the Targets be detained pending trial is to curtail these crimes inside the Development and thereby improve the quality of life for its residents.

- 9. Bromley-Heath is generally bounded by Centre Street,
 Heath Street, Walden Street, and Columbus Avenue in Jamaica
 Plain. It is one of the larger housing developments owned by
 the BHA and currently houses more than 1000 residents. As
 currently configured, Bromley-Heath includes a number of
 Projects including what was originally known as the Heath Street
 Apartments (originally constructed in 1940) and Bromley Park
 (completed in 1954), and Bickford Street (built in 1964). There
 have been numerous additions to Bromley-Heath and much of the
 Project has undergone substantial renovations in recent years.
 According to the BHA website, the Development currently consists
 of 840 units ranging from 1-5 bedrooms with rents based on a
 percentage of the tenant's income.
 - 10. Bromley-Heath includes approximately 10% of the

July 7, 2016 inside 950 Parker Street. It shows a female who entered a stairwell as the Target was selling crack cocaine scurrying up the stairs.

residents in BPD's District 13. It nevertheless accounts for a greater amount of that district's crime. According to information developed by BPD's Boston Regional Intelligence Center ("the BRIC"), for example, between January 1, 2017 and December 10, 2017, the area of Bromley-Heath accounted for 36 incidents of shots fired, 8 non-fatal shootings, 1 homicide, 20 drug arrests and 25 robberies.

11. The materials attached to this affidavit as Exhibit 2 document the role that Bromley-Heath has played in the crime committed in District E-13 between January 1 and December 10, 2017. These charts, prepared by BPD's BRIC, demonstrate that in the listed categories of crime (shootings, robberies and attempted robberies, confirmed shots fired, drug related arrests, and firearm arrests), the area encompassing the Project has been plagued by high concentrations of arrests and reports of such incidents.4

⁴ Bromley-Heath has long been the target of intensive law enforcement efforts designed to combat levels of violence and gun and drug-related activity. BPD has long focused on this area using a combination of efforts including directed patrols, many long and short term drug investigations, and a wide array of community policing efforts aimed at both identifying the offenders and attacking the causes of the violence. BHA Police have also actively participated in these efforts by, among other things, seeking to exclude individuals from BHA property through No-Trespass orders issued by members of the BHA Police Department. Bromley Heath has also been the focus of a number

12. There may be various explanations for the concentration of violence at Bromley-Heath. However, it seems undeniable that the Project also has been the locus of significant amounts of drug activity and the location of the city's most active gang dispute. Both of these are believed to have substantially contributed to the levels of violence at the Development and helped to focus investigative strategies in the

United States v. Gibbons, 553 F.3d 40, 41-42 (1st Cir. 2009).

of previous joint federal-state operations.

In a case arising out of one of those operations, this is how the United States Court of Appeals described the darker side of this Housing Development:

The Bromley-Heath public housing project, operated by the Boston Housing Authority ("BHA"), serves Boston's low-income population in need of affordable housing. In early 2006, Bromley-Heath had an extremely high rate of drug offenses, violent crimes, firearm incidents, fatal shootings, and sexual assaults. Indeed, one Bromley-Heath building, 279 Centre Street, was one of ten "red zones" designated by the City of Boston—a red zone is a hot spot where a number of shootings have occurred. The FBI and the Boston Police Department ("BPD") worked together to fight crime in the project, trying, among other things, to reduce drug trafficking and the violent crime it breeds. Despite the crime, Bromley-Heath had a long waiting list of people hoping to live there.

underlying investigation.

Another factor that is believed to be contributing to the violence at Bromley-Heath is that it is the location of one of the city's active gang disputes involving the Heath Street Gang ("Heath St."). According to information generated by the Boston Police Department, Heath St. is one of the larger gangs in the city with nearly 100 individuals believed to be actively associated with it. For many years, Heath St. has been involved in an ongoing dispute with a group from the area around Holworthy Street in Roxbury known as "H-Bloc" (as well as several other more sporadic disputes with other area groups) that has been one of the most active disputes in the city. "Prosecutor: Shooting Victim, 18, Mistaken for Gang Rival" (Boston Globe April 29, 2009) (discussing Commonwealth's case against a Heath Street member alleged to have shot a Belmont High School student under the mistaken belief that he was an H-Block member, in which prosecutor told a Suffolk County jury that, at of the time of the 2009 trial, there had been 50 shootings between members of Heath Street and H-Bloc). See also discussion at paragraph 47, below (recounting the shooting of

Heath Street member JAVONTE ROBINSON in 2014 and the subsequent arrest of an identified H-Bloc member for that shooting.⁵

Of course, crime committed in and around the Development is not limited to the major crime categories already discussed. In addition, residents of the Development are also confronted with quality of life offenses such as trespassing, public drinking and drug use, disorderly conduct and prolific use of (mostly illegal) dirt bikes or other public disturbances. Most of these crimes are committed by individuals (many of whom are associated with the Heath Street Gang but do not live in the Development) who persistently hang around the Development in large groups often taking over street corners, hallways, building entrances, play areas, or parking lots, thereby forcing residents to go around them to get to their homes. Residents of the Development frequently express concerns for their safety and the quality of life within their community. Complaints of groups of males (often individuals who may have grown up in the area or have relatives in the area but who themselves now live outside the Development) congregating in front of residences, in

⁵ More recently, a juvenile who was alleged to have made a delivery of crack cocaine to the cooperating witness in the underlying investigations and who was hanging out inside 277 Centre Street during another charged buy was shot and thereafter succumbed to his wounds.

courtyards, and within the playgrounds of the Development are commonplace. Heath Street members utilize areas within the Development as open-air drug markets, and are often themselves seen consuming marijuana and alcohol in public and in hallways and entrances. This has led to an atmosphere of fear and intimidation among many of the communities' residents. Both the buys that were made and surveillance conducted during the course of the underlying investigations here have corroborated these complaints.

15. Incidents such as those reported herein continue to plague the Development in spite of the concerted efforts of the Boston Police Department and Boston Housing Authority Police to patrol proactively in the Development. Known Heath Street members and associates are routinely encountered by officers from the BHA, BPD District E-13 and BPD's Youth Violence Strike

⁶ Among other things, it is believed that the presence of these individuals can leave residents afraid to place calls for police service, thereby leading to under-reporting of crime, such as large groups congregating/trespassing in courtyards and in front of residences for the purpose of, among other things, distributing and using narcotics.

Moreover, when members of local street gangs like Bromley Heath Street consistently congregate in the same areas, they put themselves (and everyone else in the area) at an increased risk of being victimized by firearm violence committed by rival gangs.

Force. However, as is most often the case during these encounters, the officers are left with little to no enforcement options if the encounter does not rise to the level of arrest; the encounter is documented on a field interrogation, observation and/or frisk report (FIO) and these individuals are free to stay in the community.

III. THE INVESTIGATION

- 16. Based on all of the foregoing, the current investigations were initiated in 2016. From their inception, the investigations have been a partnership between the Boston Police Department ("BPD") and the ATF. Members of the Boston Housing Police Department also provided invaluable assistance throughout the investigation.
- 17. The principal goals of the investigation were to attack gun and drug trafficking in Bromley-Heath with particular emphasis placed in two areas: (i) individuals who were believed to be particularly active in street and lower-level wholesale drug trafficking in the Project; and, (ii) individuals who were believed to be trafficking drugs and who were independently

⁷ Even when the quality of life offenses described herein lead to arrests, the resulting criminal charges often carry little or no consequences in busy courts focused on offenses that are more serious.

involved in the violence and gang disputes. Many of the Targets are also individuals who have persistently hung around the Development committing the kind of quality of life offenses described above.

18. To accomplish these goals, cooperating witnesses ("CWs") were used to make street-level drug purchases of crack cocaine, which appeared to be a drug of choice in the Development. Purchases of drugs (and two firearms) were captured on audio and video recording equipment and were surveilled by law enforcement to the extent possible. Many meetings and/telephone calls leading up to the meetings were also consensually recorded.

IV. THE TARGETS

- 19. To date, numerous controlled purchases of crack cocaine and two firearms have been made in the underlying investigations. On January 3, 2018, seven federal criminal indictments have been returned naming nine individuals on federal drug and/or firearm charges.
- 20. All but seven of the nine individuals named federally to date have been charged with conducting drug transactions either in or within 1000 feet of the Mildred Hailey Apartments in violation of 21 U.S.C. §§841 and 860. The first of the

remaining two Targets (FRANKLIN SAFO-AGYARE,) sold a gun less than 1000 feet from the Development while the second (identified Heath Street member KENDRICK TATE) sold drugs and a gun not far from where he was then living in Chelsea.

- which was initiated. First, it confirmed that Bromley-Heath is plagued by open-air drug trafficking that represents a threat to the well-being of all persons who reside in the Project. During the investigations, there were few days in which CWs tried but failed to buy crack cocaine from Targets inside the Project.

 Many of these (and other transactions) then took place within the Project, often in hallways or entrances where other residents must necessarily pass to go in and out of their homes, often with their families. All but two of the charged transactions occurred inside (or within 1000 feet of) the Development.
- 22. The investigations also confirmed the obvious connection between the Targets and Bromley-Heath. As set forth above, many Targets list (or at one time listed) residential addresses within the Project. All but one of the drug purchases took place either in or within 1000 feet of Bromley-Heath. All but one of the Targets has also been identified as a member of

the Heath Street Gang by BPD.

- 23. Additional information regarding individual Targets is set forth below.
- 24. **DOMINIQUE FINCH a/k/a "HEFF,"** is charged with conspiring to distribute cocaine base with his brother **JAMES** and with aiding and abetting **JAMES** in the distribution of cocaine base inside the Development.
- member of the Heath Street Gang. He has been a constant presence in the Development over the years even though his Board of Probation records show the he now lives outside Boston. He has been shot twice, once in the area of the Jackson Square T Station (immediately adjacent to the Development) and once inside the Development. Although his Board of Probation records state that he resides outside Boston, DOMINIQUE FINCH has been prosecuted for Trespassing at the Development at least 6 times.
- that includes convictions for Assault with a Dangerous Weapon,
 Armed Robbery, Witness Intimidation, Assault and Battery, and
 Assault and Battery with a Dangerous Weapon. He was on pretrial
 release at the time that he and James Finch made the charged
 sale and remains on pretrial release in Suffolk Superior Court.
 - 27. JAMES FINCH is DOMINIQUE's 32 year-old brother. JAMES

FINCH is also an identified member of the Heath Street Gang and, like his brother, has also been a regular presence in the development, having been FIO'd on scores of occasions inside the Development, frequently with other Targets.

- an extensive criminal record. JAMES FINCH has, however, been repeatedly trespassed out of the Development, was prosecuted for trespassing 4 times and has repeatedly been part of groups congregating inside the Development that drew the attention of other residents and the police.
- 29. KENDRICK TATE, a/k/a "K-ROC," is a 25-year-old who sold a cooperating witness crack cocaine and a firearm with an obliterated serial number on consecutive days in April 2017.

 Although TATE is an identified member of the Heath Street Gang, he was living outside Boston at the time of these sales. On November 1, 2017, he was convicted in Essex Superior Court on unrelated drug and firearm charges and is presently serving a 3.5-4 year sentence in State Prison.
- 30. TATE's current incarceration is only the most recent entry in a long and serious criminal record. Prior to being convicted in Essex Superior Court for carrying a firearm and possessing heroin with intent to distribute, TATE had been convicted of Assault with a Dangerous Weapon (twice), Assault

and Battery with a Dangerous Weapon, Resisting Arrest, Assault and Battery on a Police Officer, and Possession to Distribute a Class B Substance (twice). TATE also had Determinations of Delinquency for Drug Distribution and Assault and Battery and was shot in 2011 in the area of the Lenox Street Housing Development in the South End.

- 31. FRANKLIN SAFO-AGYARE, A/K/A "FRANKIE SO SMOOTH," is a resident of Worcester and the only Target not affiliated with the Heath Street Gang. He is charged with being a felon-in possession of a firearm and ammunition based on a gun sale he made to the cooperating witness in the parking lot of the Stop and Shop in Jamaica Plain, immediately adjacent to the Development. Although SAFO-AGYARE indicated during that transaction that he was willing to sell the CW more guns, he declined to travel to Boston to do so.
- 32. SAFO-AGYARE is 25 years old and has multiple convictions on his Massachusetts Board of Probation records that include convictions for Assault and Battery to Collect a Loan, Carrying a Firearm and Ammunition, Assault with a Dangerous Weapon (Gun), Resisting Arrest, Possession of a Class A Substance. SAFO-AGYARE currently has an open case in state court for Possessing a Class B Substance with Intent to Distribute and Resisting Arrest.

- 33. CERONE DAVIS, A/K/A "JP," is 25 years old and is an identified member of the Heath Street Gang. He is charged with one count of Distributing Crack Cocaine within 1000 feet of the Development. The charged transaction is one of two crack cocaine sales DAVIS made during a 10-day period in April 2017. The latter buy took place in the Development even though DAVIS was the subject of a prior No Trespass Order issued by BHA Police Officers and Davis did not appear to reside inside the Development. During one buy, DAVIS expressed an interest in getting involved in "OT" or "out of town" sales of crack cocaine with the cooperating witness.
- 34. DAVIS has a limited criminal record. Most recently, however, he was arrested on August 31, 2017 in Westbrook, Maine after police responded to an advertisement for a prostitute in Backpage.com and the defendant agreed to bring female to Westbrook, Maine to provide sex for \$300.
- 35. When DAVIS and co-defendant Ismail Abraham (who provided a residential address at the Development) arrived in Westbrook at agreed location with the female pictured in the Backpage ad, they were approached by the police. When the police dialed the number from the Backpage ad, DAVIS' phone rang. DAVIS and Ibrahim were charged with sex trafficking and the female was charged with Engaging in Prostitution.

- 36. According to the police report, a Subpoena to Backpage produced six additional advertisements using the same email address and listing Portland as a location with one or more different women. A search warrant for Defendant's phone included a text message thread where Defendant solicited a prostitute and numerous discussions involving the use of marijuana and cocaine.
- 37. JOE SIMMONS, A/K/A "PROFIT," is the 30-year-old brother of JARROD SIMMONS. JOE SIMMONS is charged with a single count of distributing cocaine base inside the Development, one of two sales he made in the underlying investigations. During the first sale on 4/14/17, JOE SIMMONS told the cooperating witness he could supply him with "eight balls all day" and would "take care" of the cooperating witness. JOE SIMMONS is also an identified member of the Heath Street Gang even though his Board of Probation Records indicates that he lives outside the Development.
- 38. JOE SIMMONS also has a substantial criminal record that includes two prior drug trafficking offenses along with convictions for Assault and Battery (twice), Possession of a Firearm, Assault and Battery with a Dangerous Weapon, Resisting Arrest, Threats, and Drug Possession. He has repeatedly committed crime while under criminal justice supervision and

violated probation twice in a single case.

- 39. JARROD SIMMONS, A/K/A "RIZZ," is the 21-year-old younger brother of JOE SIMMONS. JARROD SIMMONS is charged with a single count of distributing cocaine base in the Development, a sale set up by JAVONTE ROBINSON. JARROD SIMMONS made one other sale during the underlying investigations.
- 40. Like his older brother, JARROD is an identified member of the Heath Street Gang. His involvement was confirmed by numerous Facebook postings showing him in the company of other Heath Street Members inside the Development. JARROD was trespassed out of the Development in 2014 but still came to a cooperating witness' apartment inside the Development to make the charged sale of crack cocaine.
- 41. On March 9, 2016, BPD's Citywide Drug Control Unit executed a search warrant at JARROD SIMMONS's residence and located JARROD SIMMONS and his girlfriend in locked bedroom. In the resulting search, the police recovered a loaded Jimenez 9mm firearm, 2 bags of marijuana, a digital scale, an IPhone, a bag of suspected crack cocaine, a second bag that held 19 individually wrapped pieces of suspected crack cocaine, and \$498. Other items recovered from the same bedroom included papers in his name, two cellphones, and one IPad.
 - 42. During the charged buy (that took place while JARROD

SIMMONS was on pretrial release for the offenses described in the preceding paragraph), JARROD SIMMONS acknowledged that he was wearing an ankle bracelet and had an 8pm curfew. He was later convicted of both gun and drug offenses in connection with that same case and is presently on two years' probation.

- 43. KEVIN SMITH, A/K/A "WORKS," is a 27-year-old who is also an identified member of the Heath Street Gang. He is charged with aiding and abetting the sale of cocaine base made by JAVONTE ROBINSON on March 24, 2017 that took place within 1000 feet of the Development. SMITH also either sold or aided and abetted two other sales during the underlying investigations.
- 44. SMITH has prior convictions for Carrying a Firearm and Resisting Arrest (twice). After serving 18 months on his firearm/resisting arrest case, he violated probation twice and was sent back to jail for another 9 months.
- 45. SMITH has also been a fixture in and around the development for many years. Although BPD Reports indicate that he was on the Boston Housing Authority's No Trespass List for years, they also show that he has been arrested in the hallways or courtyards of the Development at least 7 times. On four of those occasions, individuals were either smoking marijuana or drinking inside the Development. During the most recent such

incident, officers also recovered a black M-Tech spring loaded knife from SMITH. Weapons charges arising out of this incident were later dismissed.

- 46. JAVONTE ROBINSON, A/K/A "BIG DOG," A/K/A "BIGGIE," was one of the most active dealers during these investigations. He is charged with a single count of distributing cocaine base in a deal set up by KEVIN SMITH. He also set up a sale for JARROD SIMMONS and sold more crack to the cooperating witness during the underlying investigations.
- 47. ROBINSON is 21-year-old identified member of the Heath Street Gang. He was shot in the chest in 2014 while in the Development but told the police he did not know who shot at him. An arrest was made later that day. BPD has identified the individual charged with that shooting as a member of the H-Bloc gang.
- A8. Police also responded to ROBINSON' home 60 days later.

 ROBINSON's mother reported that ROBINSON had stolen her wallet the previous day and reported that her son was "heavily gang involved." After a meeting with ROBINSON in the fall of 2016, the cooperating witness reported that ROBINSON told the CW he had recently lost four friends including one who was the victim of a homicide. ROBINSON appeared to be distraught and told the

⁸ In the December 30, 2017 Boston Globe, the paper reported that

CW he had a "chopper" (a street name for a high-powered assault rifle such as an AR-15) and nine other guns on the way to "the Projects" and intended to retaliate against anyone with whom he had a personal beef.

49. BOP Records reflect that ROBINSON has been FIO'd in the Development more than 50 times since 1/1/15 and that he is frequently in the company of other Targets.

I hereby certify under the pains and penalties of perjury that the foregoing is true to the best of my information, knowledge, and belief this 3 day of January, 2018.

KELTAR MUI Special Agent

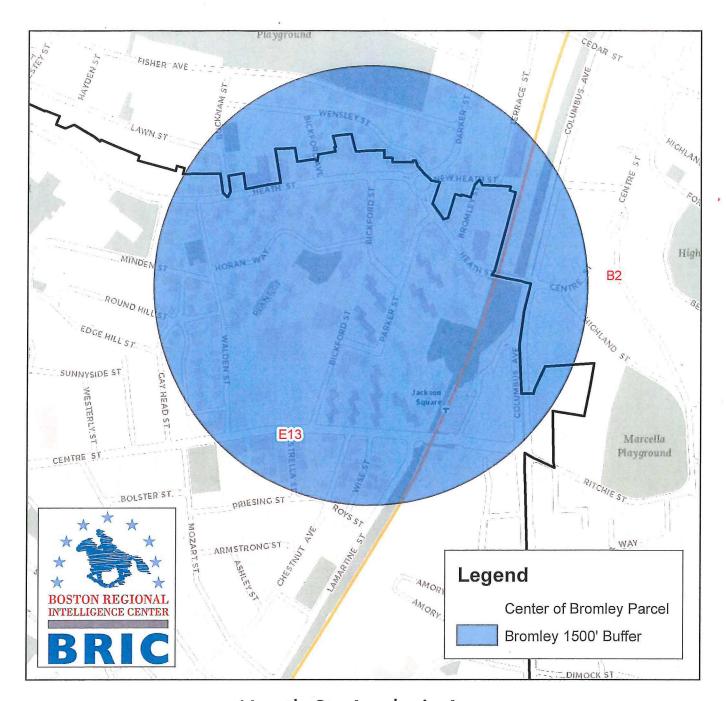
Bureau of Alcohol, Tobacco, Firearms & Explosives

the number of teenagers murdered in 2017 had doubled from the previous year and used as an example the murder of a 16 year-old who was killed on Halloween night "in a housing development in Jamaica Plain."

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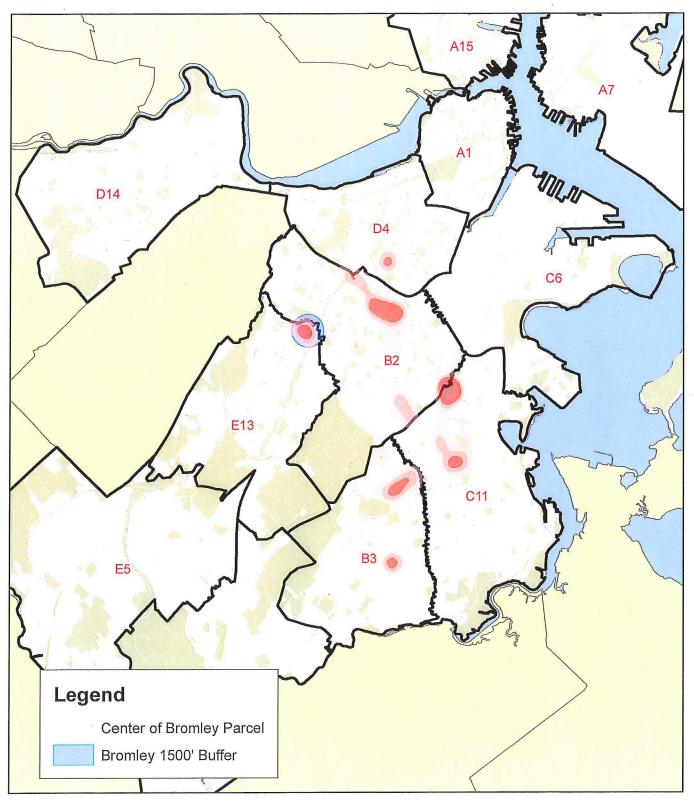
EXHIBIT 1

EXHIBIT 2



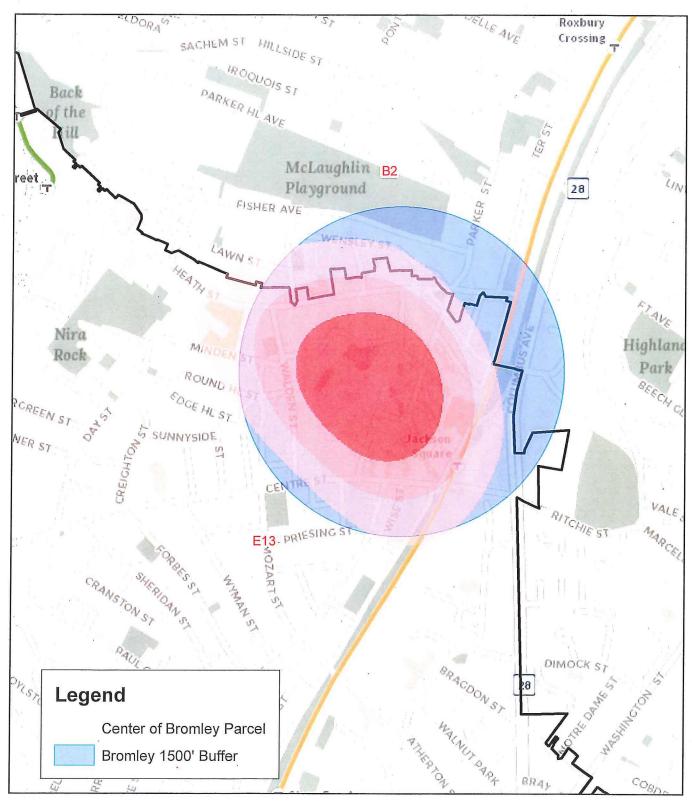
Heath St. Analysis Area 1500' Buffer from Center of Development Parcel

Violent Crime and Firearm Activity				
January 1st - December 10th, 2017				
Homicide	1			
Non-Fatal Shootings	8			
Firearm Arrests	10			
Drug Arrests	20			
Robberies	25			
Confirmed Shots Fired (Ballistics)	36			



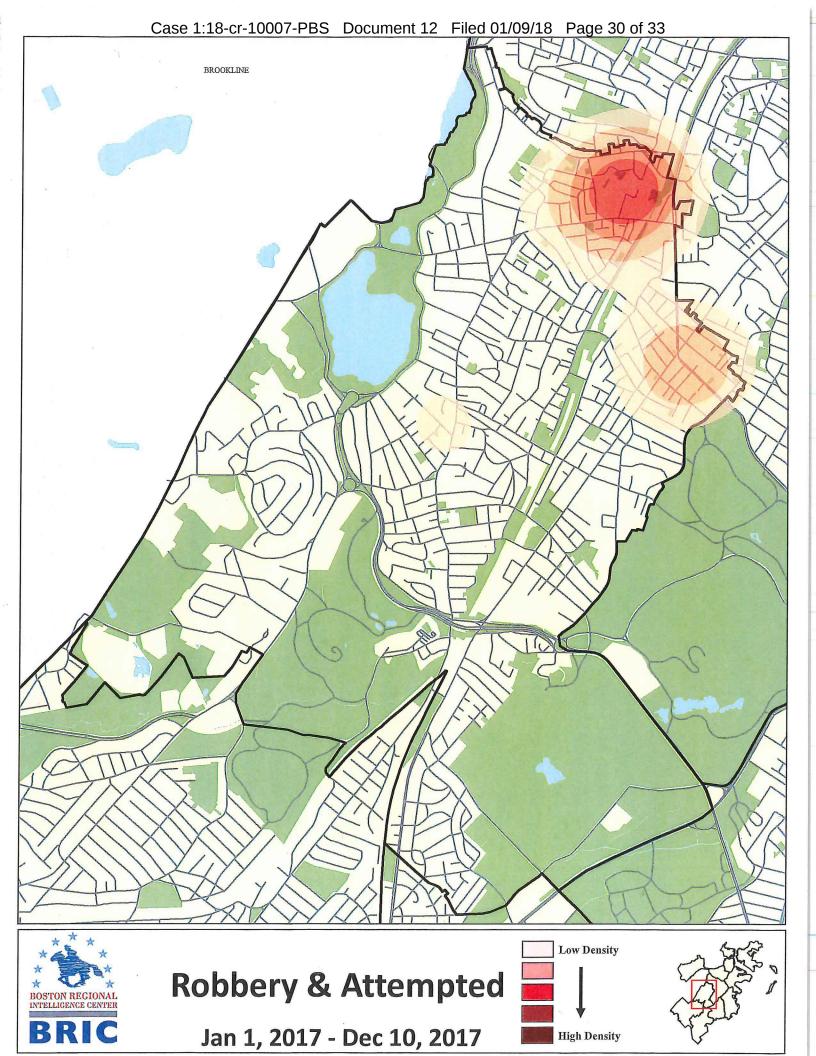


YTD 2017 Citywide Shooting Hotspot Bromley Heath 1500' Buffer Overlay





YTD 2017 Citywide Shooting Hotspot Bromley Heath 1500' Buffer Overlay



Case 1:18-cr-10007-PBS Document 12 Filed 01/09/18 Page 31 of 33 BROOKLINE Low Density **Confirmed Shots Fired** Jan 1, 2017 - Dec 10, 2017 **High Density**

